

# **EXHIBIT I**

## **Exhibit 1**

### **Disclosure Statement Depository Procedures**

1. On or after April 28, 2021, the Debtors are authorized to establish and populate an electronic document depository (the “Disclosure Statement Depository”) which shall include factual source materials and raw data underlying the Disclosure Statement (including but not limited to factual source materials and raw data underlying the cash restriction analysis, the best interest tests reports, and the Section 211 report attached to the Disclosure Statement), as well as documents relating to the nature of claims and classification under the Plan (collectively, the “Documents”).

2. Creditors may request access to the Disclosure Statement Depository by visiting [titleiiiplandataroom.com](http://titleiiiplandataroom.com).

3. The Disclosure Statement Depository will be made available only to the following parties or their representatives (collectively, “Eligible Creditors”): (i) current and former employees of the Commonwealth (also known as “public employees”); (ii) creditors of the Debtors for which a master proof of claim has been filed on such creditor’s behalf that has not otherwise been disallowed or expunged, (iii) creditors of the Debtors who have filed a proof of claim against one or more of the Debtors that has not been disallowed or expunged, (iv) creditors who were not required to file a proof of claim pursuant to the Bar Date Orders, or (v) creditors who are listed on the Debtors’ creditor matrix [ECF Nos. 10709, 1817, 830, as may be modified], in an amount greater than \$0.00.<sup>1</sup>

4. All Eligible Creditors wishing to access the Disclosure Statement Depository must

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<sup>1</sup> “Bar Date Orders” refers to the *Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claims and (B) Approving Form and Manner of Notice Thereof* [ECF No. 2521] and the *Order (A) Extending Deadlines for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 3160].

first navigate to [titleiiiplandataroom.com](http://titleiiiplandataroom.com); request access to the site; designate whether they wish to have access to public documents only or to confidential documents as well; affirm they are or represent a creditor of the Debtors; provide certain biographical information, including their name, address, telephone number, email address, proof of claim number (if available), and identify their creditor type, and if they are not the creditor, the name of the creditor and, if applicable, the representative institution they are associated with; and certify that they are eligible for access to the Disclosure Statement Depository pursuant to categories (i)-(iv) in paragraph 3 above. Access requests will be processed as promptly as reasonably practicable.

5. Eligible Creditors granted access to the Disclosure Statement Depository will receive access to all non-confidential materials posted in the Disclosure Statement Depository. To the extent Eligible Creditors also wish to access Confidential Information, such parties must agree to comply with the Protective Order annexed as Exhibit 2 to the Order, and execute the Protective

Order Subscription annexed as Exhibit 3 to the Order. The Protective Order Subscription will be available to creditors by visiting [titleiiiplandataroom.com](http://titleiiiplandataroom.com) and requesting access to confidential documents. Creditors will then be directed to OnTask, a secure signing service, in order to review the Protective Order and collect an Eligible Creditor's electronic signature on the Protective Order Subscription. Any Eligible Creditor who executes the Protective Order Subscription shall be provided access to the Confidential portion of the Disclosure Statement Depository within one (1) business day of execution and submission thereof, or as soon as reasonably practicable thereafter.

6. The Disclosure Statement Depository shall contain electronic indices of all documents in the Disclosure Statement Depository. One such index will include the publicly available Documents in the Disclosure Statement Depository and shall be made available to all Eligible Creditors once they are granted access to the Disclosure Statement Depository. The

second such index will include Documents in the Data Room containing Confidential Information, and will be made available only to Eligible Creditors who successfully request and receive access to Confidential Information by reviewing the Protective Order and signing the Protective Order Subscription. The Debtors shall use their reasonable best efforts to place Documents in the Disclosure Statement Depository to categorize Documents by topic; provided, however, that the Disclosure Statement Depository shall contain a disclaimer expressly stating, among other things, that (i) the Debtors shall not be responsible for the mis-categorization of any particular Document and (ii) each Eligible Creditor should not rely upon the categorization of the Documents and should review all categories of Documents in their entirety.

7. Notwithstanding the placement of any document in the Disclosure Statement Depository and the review of any such document by an Eligible Creditor, the Oversight Board and the Debtors shall maintain the right to object to the use or introduction of any document in the Disclosure Statement Depository in any matter or proceeding on relevance grounds or as otherwise permitted in accordance with the Federal Rules of Evidence and applicable law; provided, however, that, to the extent that a Document contained in the Disclosure Statement Depository has been created by the Debtors, such party shall have waived the right to object to the use or introduction of such document on the basis of authenticity. Additionally, to the extent that the Debtors inadvertently include privileged materials in the Disclosure Statement Depository, it shall not be deemed to comprise any waiver of any applicable privilege. Such protective measures are necessary to provide the requesting parties access to relevant materials in a timely and efficient manner.

8. In order to streamline access to the Disclosure Statement Depository and prevent overloading the Disclosure Statement Depository's website, the Oversight Board may make some or all Documents included in the Disclosure Statement Depository available to some or all Eligible

Creditors by other means, including but not limited to transmitting such Documents via a secure file transfer protocol. The Oversight Board shall make the determination to provide Documents in such fashion in its own discretion, and all other terms of use and access to the Documents included in the Disclosure Statement Depository, whether provided via the depository or via secure file transfer protocol (including relating to the use of Confidential Information), shall be identical.

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